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Attorneys for Plaintiff, DON McCOMAS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA--SAN FRANCISCO DIVISION

DON McCOMAS, an individual,

Plaintiff,

vs.

CITY OF ROHNERT PARK and **DAVID RODRIGUEZ**,

Defendants.

Case No.: 3:16-CV-02705-TEH

Hon. Thelton E. Henderson

**STIPULATION AND [PROPOSED] ORDER
FOR TELEPHONIC APPEARANCE AT
CASE MANAGEMENT CONFERENCE**

Date: August 22, 2016

Time: 1:30 PM

Courtroom: 2

Action Filed: May 18, 2016

Trial Date: None

TO THE HONORABLE COURT:

On August 22, 2016, the date of the case management conference in this matter, trial counsel for Plaintiff must appear in the morning in Lake County, California, over 2.5 hours away from San Francisco, and may not be able to reach this Court in time for the Case Management

1 Conference.

2 The parties therefore agree, and Plaintiff's counsel respectfully requests, that the Court
3 allow him to appear telephonically for the case management conference.

4 Dated: August 18, 2016

Respectfully submitted,

5 **BECK LAW, P.C.**

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8 By: /s/ Daniel B. Beck
9 Daniel B. Beck, Esq.
Attorneys for Plaintiff, DON McCOMAS

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11 Dated: August 18, 2016

12 **GEARY, SHEA, O'DONNELL, GRATTAN &
MITCHELL, P.C.**

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14 By: /s/ Raymond J. Fullerton, Esq.
15 Raymond J. Fullerton, Esq.
16 Counsel for Defendants, CITY OF
17 ROHNERT PARK and DAVID
18 RODRIGUEZ

19 ORDER

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21 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that Plaintiff's trial counsel, Daniel
22 B. Beck, is allowed to appear telephonically at the case management conference scheduled in
23 this matter on August 22, 2016 at 1:30 PM.

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25 _____
Hon. Thelton E. Henderson

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3 DECLARATION OF DANIEL B. BECK
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5 I, Daniel B. Beck, declare, as follows:

6 1. I am an attorney admitted to practice before the courts of California, and the
7 United States District Court for the Northern District of California, and am counsel of record for
8 the Plaintiff herein. I have personal knowledge of the matters set forth in the following
9 paragraphs (except as to those matters stated upon information and belief, and as to those matters
10 I believe them to be true).

11 2. I have just learned that on August 22, 2016, the date of the case management
12 conference in this matter, I must appear at 8:30 in the morning in Lake County, California on the
13 matter of People v. Norton, Lake County Case No. CR 940011 – C. This appearance is over 2.5
14 hours away from San Francisco, and I am greatly concerned that I may not be able to reach this
Court in time for the Case Management Conference

15 I declare under the penalty of perjury of the laws of the state of California that the
16 foregoing is true and correct.

17 Executed at Santa Rosa, California, on August 18, 2016.

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19 /s/ Daniel B. Beck
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